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2 District of Nevada
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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 JANORA R. WINSOR,)
11 Plaintiff,) Case No. 2:14-cv-00347-GMN-PAL
12)
13 v.)
14 CAROLYN W. COLVIN,) **UNOPPOSED MOTION FOR**
15 Acting Commissioner of Social Security,) **EXTENSION OF TIME**
16 Defendant.) **(FIRST REQUEST)**

17

18 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
19 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm and
20 Response to Plaintiff’s Motion for Remand, due on September 29, 2014, by 30 days, through and
21 including October 29, 2014. There is good cause for this request because agency counsel assigned to the
22 case will be out of the country from September 12, 2014, through September 26, 2014. More time is
23 necessary in order to responsibly research and brief this case. This request is made in good faith with no
24 intention to unduly delay the proceedings. Counsel for Defendant conferred with Plaintiff’s counsel,
25 who has no opposition to this motion, on September 10, 2014.

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1 Respectfully submitted this 10th day of September 2014.

2 DANIEL G. BOGDEN
3 United States Attorney

4 /s/ Heather M. Moss
5 HEATHER M. MOSS
6 Assistant Regional Counsel

7 OF COUNSEL:

8 DONNA L. CALVERT
9 Regional Chief Counsel, Region IX

10 IT IS SO ORDERED:

11 
12 UNITED STATES MAGISTRATE JUDGE

13 DATED: September 12, 2014

CERTIFICATE OF SERVICE

I, Heather M. Moss, certify that the following individual was served with a copy of the
UNOPPOSED MOTION FOR EXTENSION OF TIME on the date and via the method of service
identified below:

CM/ECF:

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Dated this 10th day of September 2014.

/s/ Heather M. Moss
HEATHER M. MOSS
Assistant Regional Counsel